

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

NEW CENTURY MORTGAGE CORP., )  
Plaintiff, )  
vs. ) No. 05 C 2370  
GREAT NORTHERN INSURANCE ) Judge Coar  
COMPANY, FEDERAL INSURANCE )  
COMPANY,  
Defendants. )

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**NOTICE OF MOTION**

TO: Daniel J. Cunningham, Esq.  
Kathy Karaboyas Malamis, Esq.  
Tressler, Soderstrom, Maloney & Priess  
Sears Tower, 22nd Floor  
233 S. Wacker Drive  
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PLEASE TAKE NOTICE that on September 13, 2006 at 9:00 a.m., Plaintiff shall present the attached **PLAINTIFF'S MOTION TO STAY PROCEEDINGS PENDING THE ILLINOIS SUPREME COURT'S DECISION IN VALLEY FORGE v. SWIDERSKI**, to Judge Coar or whomever may be sitting in his stead in Courtroom 1419 in the United States Courthouse located at 219 S. Dearborn St., Chicago, IL 60604.

Respectfully submitted.  
NEW CENTURY MORTGAGE CORPORATION

Dated: September 7, 2006

/s/ Bart T. Murphy \_\_\_\_\_  
By one of its attorneys

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**CERTIFICATE OF SERVICE**

The undersigned, an attorney, states that on the 7th<sup>t</sup> day of September 2006 he electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which sent notification to the following:

Daniel J. Cunningham                          at d cunningham@tsmp.com

Kathy K Karaboyas                          at k malamis@tsmp.com

/s/ Bart T. Murphy  
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